

March 13, 2014

Mr. Charles David Abshire (6SF-AP)
Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

RE: February 2014 Monthly Report
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

On behalf of the Malone Cooperating Parties (MCP), in compliance with and pursuant to the Consent Decree (CD) and Statement of Work (SOW) for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX, attached please find the Monthly Report for February 2014.

Should you have any questions, please contact me at 919-539-1928 or [bobjp@projectnavigator.com](mailto:bobp@projectnavigator.com).

Sincerely,

R Piniewski

Robert Piniewski
Project Coordinator

cc: Marilyn Long - TCEQ
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE
MONTHLY PROGRESS REPORT FOR FEBRUARY 2014
SUBMITTED MARCH 14, 2014**

1) SUMMARY OF WORK PERFORMED IN FEBRUARY 2014

- a) PNL, ENTACT and MCP representatives continued evaluation of information collected during the Phase One RD work and planning for Phase One RA work.
- b) MCP representatives prepared a response to comments received from EPA and TCEQ on the Phase One RA Work Plan.
- c) MCP representatives notified EPA that in response to the petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.
- d) MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation.
- e) MCP representatives continued stormwater management activities at the Site.

2) SUMMARY OF SAMPLING/TESTING RESULTS

- a) None.

3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS

- a) A summary of the most recent Agency Communication is shown in Table 1.

4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN

- a) None.

5) COMMUNITY RELATIONS ACTIVITIES

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

6) CHANGE IN PERSONNEL OR OPERATIONS

- a) None.

7) SCHEDULE

- a) The Phase One RD Work Plan contains the project schedule.

8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS (MARCH AND APRIL 2014)

- a) Review and submit responses to EPA and TCEQ comments on the draft Phase One RA Work Plan.
- b) Mobilize for Phase One RA work following EPA approval of the response to comments and the Phase One RA Work Plan.
- c) Continue evaluation of solidification and water management options and planning for Phase One RA field work.
- d) Preparation and mobilization for field efforts associated with the Cemetery Relocation.
- e) Continue stormwater management activities at the Site.
- f) Prepare WDW-138 and WDW-73 Rehabilitation Work Over Procedures for EPA review. Complete WDW-138 and WDW-73 Rehabilitation Work Over Procedures once approved by EPA.
- g) Prepare the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells.

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One Remedial Action Work Plan.	pending		
12/20/13	Submitted draft Phase One Remedial Action Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	Comments received.	
1/31/14	MCP received EPA and TCEQ comments on Phase One Remedial Action Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	
2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	

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Recent Agency Communication Summary
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Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		